



## Department of Environmental Quality

522 S.W. FIFTH AVENUE, BOX 1760, PORTLAND, OREGON 97207 PHONE: (503) 229-5696

OR 1398

2-8-83

4e

FILE COPY

February 8, 1983

Jack F. Johnston  
Van Waters and Rogers  
Division of UNIVAR  
PO Box 10287  
Portland, OR 97210

Coded HWPMS  
"NOV-manifest Viol."  
Resolved 2/14/83 jwf  
9/8/83

Re: HW - Van Waters and Rogers  
Multnomah County

Dear Mr. Johnston:

On January 5, 1983, the Department met with you and other representatives of Van Waters and Rogers to discuss the company's current hazardous waste manifest and treatment activities.

Examples were discussed where shipments of hazardous waste were accepted even though the manifest was not completed in accordance with OAR 340-63-230. Specifically, the manifests were either incomplete (lacking required information) or were inaccurate. The inaccuracies were instances where Van Waters and Rogers was designated as T/S/D/F on some manifests when in fact the company was acting only as a storage or collection site for the hazardous waste shipment. Company representatives agreed to review manifests for completeness and accuracy and thus fully comply with OAR 340-63-425 to document that hazardous wastes are adequately managed from "cradle to grave."

I have enclosed copies of the OAR's governing management facilities. Please read them carefully and the license requirements previously mailed to you. All rules and requirements apply to Van Waters and Rogers and must be strictly adhered to.

During the meeting the Department was advised that corrosive chemicals were received from off-site, subject to neutralization and disposed of through the sanitary sewerage system. It was pointed out that such a treatment process needs a license and that the current license is not adequate to cover same. Company representatives argued that the chemicals were not a waste and were therefore not subject to regulation. Since this issue was not resolved to the Department's satisfaction, it is requested that Van Waters and Rogers submit to the Department detailed information of the corrosive chemicals neutralized no later than February 22, 1983. This information shall include:

1. The name and quantity of the chemicals received from off-site facilities for treatment.

USEPA RCRA



3019435



Jack F. Johnston  
February 8, 1983  
Page 2

2. The name of the off-site company(s) consigning the chemicals to Van Waters and Rogers.
3. How the off-site company receives the chemicals (i.e., bulk, 55-gallon drums, etc.).
4. Whether the chemicals are removed from their original containers and, if so, for what purpose.
5. Why the chemicals become unusable by the off-site facility.

By providing information on all chemicals received and treated by Van Waters and Rogers, the Department can decide whether modification of the treatment site license is indicated and whether the chemicals should be included in the hazardous waste management system.

If you have questions, please call me at 229-5296.

Sincerely,

Gregory D. Baesler  
Environmental Analyst  
Northwest Region

GDB:c  
RC218

cc: Enforcement Section, DEQ  
Hazardous Waste Operations, DEQ